

MEMO ENDORSED

The Honorable Jessica G. L. Clarke
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

May 7, 2025

Jones
Law Firm P.C.

Application GRANTED. The *Curcio* hearing scheduled for May 21, 2025 is ADJOURNED to May 20, 2025 at 11:00 a.m. in Courtroom 11B, 500 Pearl Street, New York, New York, 10007. The Clerk of Court is respectfully directed to terminate the letter motion at ECF No. 62.

Via ECF

Dated: May 7, 2025

New York, New York

Re: *United States v. Isaac Briggs III* – 23 CR. 644 (JGLC)

SO ORDERED.



JESSICA G. L. CLARKE
United States District Judge

Dear Judge Clarke,

Yesterday you scheduled a *Curcio* hearing to be held on 5/21/2025.

I have a conflict on 5/21/2025.

I wrote to Mr. Kinder and asked if he would consent to an adjournment. I told him that I was available 5/20, 5/22, 5/23, and 5/26; that I was having surgery on 5/27 that would lay me up for 2 weeks, and that I was again available any time from June 10, 2025, onward.

Mr. Kinder responded that he couldn't do 5/22, and that 5/26 is Memorial Day, but that he could do 5/20 in the morning, and 5/23 in the afternoon. He said that he is on trial all of June, and that if we couldn't do 5/20 AM, or 5/23 PM, that it would have to be pushed to July.

I am attaching the exchange of emails between myself and Mr. Kinder.

I am writing to plead with your Honor to please reschedule the *Curcio* hearing (and if appropriate, the argument on our motions to vacate Mr. Briggs' plea, and to modify the Protective Order), if at all possible, to either the morning of May 20th, or the afternoon of May 23rd; and if neither of these alternatives is possible, then to any day in early July.

I thank you for your kind attention to this letter.

Respectfully submitted,


Elaine, Platt, Esq., Of Counsel
Jones Law Firm, P.C.
5 Tudor City Place
New York, NY 10017
Office: (212) 258-0685
Direct: (646) 602-1489
elaine@joneslawnyc.com
Attorneys for Defendant
Isaac Briggs III

cc. Counsel of Record via ECF



Elaine Platt <elaine@joneslawnyc.com>

reschedule hearing

6 messages

Elaine Platt <elaine@joneslawnyc.com>

Tue, May 6, 2025 at 4:31 PM

To: "Kinder, William (USANYS)" <william.kinder@usdoj.gov>

Will, the court has scheduled a Curcio hearing, as well as oral argument on the motion to vacate briggs' plea, for May 21.

I have a conflict on that date.

I am available 5/22 , 5/23, and 5/26.

I am having minor surgery 5/27, which will lay me up for 2 weeks.

Will you consent to an adjournment to either 5/22, 5/23, 5/26, or after 6/10?

Kinder, William (USANYS) <William.Kinder@usdoj.gov>

Tue, May 6, 2025 at 8:58 PM

To: Elaine Platt <elaine@joneslawnyc.com>

Cc: "Delfiner, Rebecca (USANYS)" <Rebecca.Delfiner@usdoj.gov>

Hi Elaine:

What is your conflict on 5/21? Of the alternative dates you propose, only the afternoon of 5/23 would work for us. 5/26 is Memorial Day, and Rebecca and I each have June trials which mean we cannot do after June 10 unless it was pushed out until July.

Please make sure to copy my colleague Rebecca in emails about this case.

William C. Kinder

Assistant United States Attorney

United States Attorney's Office

Southern District of [New York](#)[26 Federal Plaza, 37th Fl.](#)[New York, NY 10278](#)

(212) 637-2394 (office)

(646) 530-3960 (cell)

William.Kinder@usdoj.gov

[Quoted text hidden]

Elaine Platt <elaine@joneslawnyc.com>

Tue, May 6, 2025 at 9:10 PM

To: "Kinder, William (USANYS)" <William.Kinder@usdoj.gov>

Cc: "Delfiner, Rebecca (USANYS)" <Rebecca.Delfiner@usdoj.gov>

As always, I really appreciate your prompt reply.

I will ask the judge to reschedule to 5/23 in the afternoon, or push it to June, and attach our email exchange to my letter.

[Quoted text hidden]

Elaine Platt <elaine@joneslawnyc.com>

Tue, May 6, 2025 at 9:34 PM

To: "Kinder, William (USANYS)" <William.Kinder@usdoj.gov>

Cc: "Delfiner, Rebecca (USANYS)" <Rebecca.Delfiner@usdoj.gov>

Before I write to the court, what about Tuesday, 5/20.

I have Doctor's appointments that day, but I would reschedule them if that date would work for you and the court.

[Quoted text hidden]

Kinder, William (USANYS) <William.Kinder@usdoj.gov>

Tue, May 6, 2025 at 10:29 PM

To: Elaine Platt <elaine@joneslawnyc.com>

Cc: "Delfiner, Rebecca (USANYS)" <Rebecca.Delfiner@usdoj.gov>

We could do the morning of Tuesday, 5/20.

[Quoted text hidden]

Elaine Platt <elaine@joneslawnyc.com>

Tue, May 6, 2025 at 11:36 PM

To: "Kinder, William (USANYS)" <William.Kinder@usdoj.gov>

Cc: "Delfiner, Rebecca (USANYS)" <Rebecca.Delfiner@usdoj.gov>

thanks. I'll add this alternative to my letter to the court.

[Quoted text hidden]